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Attorneys for Plaintiffs  
CLAUDIA SANCHEZ, ERIN WALKER  
and WILLIAM SMITH

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

CLAUDIA SANCHEZ, ERIN WALKER and  
WILLIAM SMITH, as individuals, and on behalf  
of all others similarly situated,

Plaintiffs,

v.

WELLS FARGO & COMPANY, et al.

Defendants.

) Case No.: C 07-05923 WHA (JCSx)

) Assigned Judge: Hon. William H. Alsup

) **PLAINTIFFS' NOTICE OF TAKING  
DEPOSITION**

) DATE: April 25, 2008

) TIME: 10:30 a.m.

TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure, Rules 26 and 30, Defendants, WELLS FARGO & COMPANY and WELLS FARGO BANK, N.A., shall produce the following deponent to appear for deposition on April 25, 2008, commencing at the hour of 10:30 a.m., upon oral examination at the law offices of Covington & Burling, located at One Front Street, San Francisco, California, on the dates and times as specified below, before a notary public/certified shorthand reporter authorized to administer oaths. Said depositions may be recorded by videotape in addition to recording the testimony stenographically, and further, plaintiffs may record the testimony by stenographic method, through the instant visual display of the testimony.

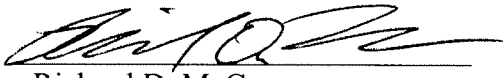
DEPONENT: 30(b)(6) WITNESS(ES)/PERSON(S) MOST KNOWLEDGEABLE  
REGARDING WELLS FARGO'S DATABASES RE:

- a. The proprietary and non-proprietary databases used to record and store individual customer transactions;
- b. The data fields contained and recorded related to individual transactions of customers;
- c. Queries and searches that can be run from the databases.

Said deposition will continue day to day, or on such other dates as the parties mutually agree to, until completed.

DATED: April 4, 2008.

McCUNE & WRIGHT, LLP

BY:   
Richard D. McCune  
Attorney for Plaintiffs

Case: SANCHEZ, et al. v. WELLS FARGO BANK, et. al.

PROOF OF SERVICE

STATE OF CALIFORNIA  
COUNTY OF SAN BERNARDINO

I am employed in the County of San Bernardino, State of California. I am over the age of 18 years and not a party to the within action; my business address is 2068 Orange Tree Lane, Suite 216, Redlands, California, 92374.

On April 8, 2008, I served the foregoing document described as **PLAINTIFFS' NOTICE OF TAKING DEPOSITION** on the interested parties through their respective attorneys of record in this action, by placing a ☒ true copy or ☐ original thereof enclosed in sealed envelopes addressed as follows:

**Sonya D. Winner, Esquire**  
**David M. Jolley, Esquire**  
**Margaret G. May, Esquire**  
**COVINGTON & BURLING, LLP**  
**One Front Street**  
**San Francisco, CA 94111**  
**Telephone: (415) 591-6000**  
**Facsimile: (415) 591-6091**

**Attorneys for Defendants**

**METHOD OF SERVICE:**

- [ X ] **(BY MAIL)** I am readily familiar with the firm's business practice for collection and processing of correspondence for mailing. Under that practice, I caused such envelopes with postage thereon fully prepaid to be placed in the United States mail at Redlands, California.
- [ ] **(BY E-MAIL)** By transmitting it to the following individuals by electronic mail:  
Sonya D. Winner: SWinner@cov.com  
David M. Jolley: djolley@cov.com
- [ ] **(BY FAX)** I caused such documents to be transmitted by facsimile to the offices of the addressee(s). The facsimile machine used complied with California Rules of Court, rule 2003, and no error was reported by the machine.
- [ ] **(BY OVERNIGHT DELIVERY)** I caused such document to be delivered by overnight delivery to the offices of the addressee(s).

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. Executed on the above-referenced date at Redlands, California.

  
Ann Marie Smith